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25 **UNITED STATES DISTRICT COURT**
26 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
27 **SAN FRANCISCO DIVISION**

28 IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Nokia Corporation and Nokia Inc. v. AU
Optronics Corporation, et al., 09-cv-5609

Eastman Kodak Company v. Epson Imaging
Devices Corp., et al., 10-cv-5452

Best Buy Co., Inc. et al. v. AU Optronics
Corporation, et al., 10-cv-4572

Target Corp., et al. v. AU Optronics
Corporation, et al., 10-cv-4945

Electrograph Systems, Inc., et al. v. Epson
Imaging Devices Corp., et al., 10-cv-0117

MDL FILE NO: 3:07-md-1827-SI

STIPULATION AND [PROPOSED]
ORDER PERMITTING 30(b)(6)
DEPOSITION OF TOSHIBA
MOBILE DISPLAY CO., LTD.
BEYOND DISCOVERY CUTOFF
DATE

1 Plaintiffs Nokia Corporation, Nokia Inc., Eastman Kodak Company, Best Buy Co., Inc.,
2 Target Corp., Sears, Roebuck & Co., Kmart Corp., Old Comp Inc., Good Guys, Inc., RadioShack
3 Corp., Newegg, Inc. and Electrograph Systems, Inc. (collectively, "Plaintiffs") and defendant
4 Toshiba Mobile Display Co., Ltd. ("TMD") hereby stipulate and agree as follows:

5 WHEREAS, Eastman Kodak Company, Best Buy Co., Inc., Target Corp., Sears,
6 Roebuck & Co., Kmart Corp., Old Comp Inc., Good Guys, Inc., RadioShack Corp., Newegg,
7 Inc. and Electrograph Systems, Inc., issued a Notice of Deposition Pursuant to Fed. R. Civ. P.
8 30(b)(6) to TMD on November 4, 2011.

9
10 WHEREAS, Nokia Corporation and Nokia Inc. issued a Cross Notice of Deposition
11 Pursuant to Fed. R. Civ. P. 30(b)(6) to TMD on November 22, 2011.

12 WHEREAS, the Parties have conferred to discuss the scheduling of the noticed 30(b)(6)
13 deposition.

14 WHEREAS, the upcoming depositions of TMD merit witnesses may obviate the
15 necessity of the deposition.

16 WHEREAS, in the interest of efficiency and preventing the unnecessary expenditure of
17 resources, the Parties agree to defer the scheduling of the deposition until after January 15, 2012,
18 with the deposition to take place no later than February 15, 2012.

19 WHEREAS, the Parties agree to negotiate in good faith the deposition topics identified in
20 both the deposition notice and cross notice.

21 WHEREAS, the Parties agree that nothing in this stipulation prejudices the rights of any
22 of the Parties with respect to the noticed deposition.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among undersigned counsel, on behalf of their respective client, Plaintiffs, on the one hand, TMD on the other hand, that:

1. The discovery cutoff date of December 8, 2011 be extended for the sole purpose of the aforementioned noticed deposition, but not for any other discovery; and
 2. The Plaintiffs may take the 30(b)(6) deposition of TMD on a mutually agreeable date no later than February 15, 2012.

Dated: December 8, 2011.

/s/ Valarie C. Williams
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Attestation: Pursuant to N.D. Cal. General Order 45, Part X-B, the filer of this document attests that the concurrence of the other signatories thereto has been obtained.

Dated: December 8, 2011.

By: /s/ Valarie Williams
Valarie C. Williams

[PROPOSED] ORDER

IT IS SO ORDERED

DATED this 12 day of December, 2011.
th

By: *Susan Illston*
Hon. SUSAN ILLSTON

STIPULATION AND [PROPOSED] ORDER PERMITTING
30(B)(6) DEPOSITION OF TOSHIBA BEYOND DISCOVERY
CUTOFF DATE